CDVAOHI The HIPAA Internal Assessment Instrument and Safeguards Plan

This Internal Assessment Instrument and Safeguards Plan is intended to help CDVA Managers supervisors to conduct an internal assessment of whether confidential information is protected by reasonable administrative, technical and physical safeguards. This instrument is intended to be used with CDVAOHI Guidance Memorandum 100.A, Guidance for CDVA Managers and Supervisors.

Office, Program or Unit Assessed:	
Location Address:	
Name of Person Conducting Assessment:	
Date of Internal Assessment:	
Instructions: Circle the response that hest describes w	our anvironment

Instructions: Circle the response that best describes your environment.

A. Physical Environment

	Less Secure				More Se	cure
Facility is shared with other organizations.	Shared with non-CDVA organizations	0	Shared with other CDVA organizations	1	No, it's a separate facility for this office or unit.	2
CDVA controls facility.	Telecommuting or out- stationed site.	0		1	Owned or leased by CDVA.	2
The floor plan of the work area includes lockable offices.	Open floor plan.	0	Mixed	1	Staff assigned offices.	2
The overall physical security of the office (locks, lighting, doors, etc.) is:	Basic or flawed.	0	Good	1	Excellent	2

B. Reception

	Less Secure				More Se	ecure
The front door is locked or has a live security guard during business hours.	No	0	Usually	1	Always	2
We have a policy requiring ID to enter this office.	No	0		1	Yes	2
The reception area is shared between several programs.	Shared reception for several programs.	0		1	Single reception area for each program.	2
The receptionist is on duty when the front door is unlocked.	No	0	Usually	1	Always	2
The reception and work areas are separated.	Not separated	0	Separated by passageway or unlocked door	1	Separated by locked (buzzer) door.	2

C. Pedestrian Traffic

	Less Secure				More Se	cure
Clients or other visitors can enter work area where confidential information is used or stored	Can wander offices freely	0	If on business, usually escorted	1	Not allowed in secure areas at all	2
Policies require employees to use reasonable measures, such as speaking in a soft voice about confidential issues when in public areas.	No	0	Some polices exist	1	Yes, policies are detailed and clear	2
Contractors such as janitorial service, maintenance, computer services, and food vendors can enter work areas.	Can enter office on their own after hours	0	Sometimes unaccompanied in office	1	Never in office except when accompanied	2
Contractors are required to complete a confidentiality agreement.	No	0	Usually	1	Always	2
Employees can enter and leave after hours.	Yes, without restriction	0	Yes, with sign-in or other controls	1	No, except as authorized by management	2

D. <u>Document Storage</u>

	Less Secure Secure				More	
Most files are kept in a separate, lockable room or vault.	No	0	Sometimes	1	Always	2
Policy defines which employees are permitted to enter the file room or vault.	No	0	Yes, but may not always be followed	1	Always	2
File cabinets are locked when not in use.	No	0	Sometimes	1	Always	2
Unlocked file cabinets are located where an unauthorized person could open them and access files.	Yes	0	Usually	1	No	2
Policy prohibits unauthorized person From viewing files unlocked file cabinets.	No	0		1	Yes	2
Paper records are visible on desktops, work tables etc.	Yes	0	Sometimes	1	Never except when being used	2
Policy prohibits employees from leaving confidential information on desktops, work tables, etc.	No	0	Usually	1	Always	2

E. <u>Document Destruction</u>

	Less Secure				More S	ecure
We have procedures and practices for destruction of documents that contain confidential information.	No	0	Sometimes	1	Yes	2
Does this location have a shredder(s)?	No	0	Yes, but it is always used	1	Yes, and heavily used	2
Does this location have an outside company remove and destroy confidential documents and materials?	No	0	Yes, but not sure of quality	1	Yes, a high-quality firm	•
Does this location have locked confidential document storage containers?	Yes	0	Usually	1	No	2
Are confidential documents ever discarded in ordinary trash?	No	0		1	Yes	2

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CDVAOHI Form 1911

Internal Assessment Instrument and Safeguards Plan HIPAA PRIVACY

F. Electronic Media Storage

	Less Secure					More Sec	cure
Tapes, disks, and cartridges are kept in a locked cabinet or room	No	0	Sometimes	1	Always		2
Policies define which employees are permitted to enter secure data areas	No	0		1	Yes		2
Policies and procedures prohibit removing confidential data from the office except as authorized	No	0	Yes in theory but maybe not in practice	1	Yes		2

G. Workstations and Facsimile

	Less Secure				More Se	cure
The office has reasonable physical safeguards, such as partitions or client interview booths, to prevent unauthorized viewing of computer screens.	No	0	Sometimes	1	Yes, all are	2
All applications that contain confidential information require at least password security.	No	0	Some	1	Yes, all are	2
Policy requires that employees exit or lock applications or systems that have confidential information when leaving their workstations.	No	0	Yes in theory but maybe not in practice	1	Yes	2
All screens set to screen savers automatically	No	0	Usually	1	Yes	2
Policy prohibits unauthorized person from viewing files unlocked file cabinets.	No	0		1	Yes	2
Paper records are visible on facsimile systems, desktops, work tables etc.	Yes	0	Sometimes	1	Never except when being used	2
Policy prohibits employees from leaving confidential information on desktops, work tables, etc.	No	0	Usually	1	Always	2

H. Totals

Subtotals			
 A. Physical Environment B. Reception C. Pedestrian Traffic D. Document Access/Storage E. Document Destruction F. Electronic Media Storage G. Workstations and Facsimile 			
Add subtotals above			
<u>Totals</u>			

NOTE:

Scoring Legend:

0-36 indicates few meaningful safeguards.

37-54 suggests that reasonable safeguards are in place for a typical client service organization.

55-72 suggests that strong safeguards are in place.

These guidelines are only approximate. More stringent guidelines may be appropriate for highly sensitive information and offices that provide direct service to the public.

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CDVAOHI Safeguards Plan

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G. Workstations and Facsimile	
Insert any suggestions or recommendations for your division or office:	
Division	
Office, Unit, or Program	
Assessed	
Location	
Name of Barrers	
Name of Person Conducting Assessment	
Title of Person	
Conducting Assessment	